

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

HELEN A. RUNGE,	:	
Plaintiff	:	
	:	No. 05-10849-RGS
v.	:	(Judge Stearns)
	:	
WALTER J. KELLY, et al.	:	CIVIL ACTION
Defendants	:	JURY TRIAL DEMANDED

PLAINTIFF'S ANSWER TO
DEFENDANT KERRY L. BLOOMINGDALE, MD.'S
PARTIAL MOTION TO DISMISS

AND NOW, COMES, Plaintiff, Helen A. Runge, in response to Defendant Kerry L. Bloomingdale, M.D.'s Motion to dismiss Count I and Count II of her Complaint pursuant to Fed. R. Civ. P. 12(b)(6), and requests this Honorable Court deny Defendant's Motion to Dismiss. In support of this request, Plaintiff submits the accompanying Memorandum of Law.

WHEREFORE, Plaintiff, Helen A. Runge, respectfully requests this Honorable Court enter an Order denying the Defendant's Motion To Dismiss.

Respectfully submitted,

LATSHA DAVIS YOHE & MCKENNA, P.C.

Dated: November 29, 2005

By /s/ Glenn R. Davis
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